

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC # _____
DATE FILED: 3/19/2020

RICHARD J. MA, ESQ.

315 Broadway, Ste. 200
New York, New York 10007
Tel. (212) 431-6938
Fax. (212) 233-6937
E-mail: richardmaesq@yahoo.com

MEMO ENDORSED

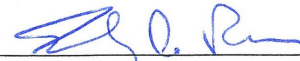
March 19, 2020

Via ECF and E-Mail

Honorable Edgardo Ramos
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
Brooklyn, NY 10007

The March 25 pretrial conference is adjourned to May 14, 2020, at 3:30 PM. Speedy trial time is excluded from March 25, 2020, until May 14, 2020, in the interest of justice.

SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: 3/19/2020

New York, New York

Re: *United States v. Angela Rodriguez and Shawndale Lewis*
20 Cr. 39 (ER)

Dear Judge Ramos:

As Your Honor is aware, I represent Mr. Shawndale Lewis in the above-referenced matter. This correspondence is submitted to request an adjournment of the next status conference, which is currently scheduled for March 25, 2020.

Defense counsel in this matter are still in the process of reviewing the discovery in this matter, which is voluminous. Thus, to allow time for the continued review of discovery, client communications and plea negotiations, we respectfully request an adjournment of the upcoming status conference. We additionally note that, in light of the ongoing health crisis, the requested adjournment is a sensible precaution to reduce the possibility of exposure to the COVID-19 virus and is consistent with Chief Judge McMahon's Standing Order, *In re Coronavirus/COVID-19 Pandemic*, 20 Misc.154. Based upon my communications with A.U.S.A. Samuel P. Rothschild and co-counsel Matthew Kluger, the parties consent to this request. Finally, in the event that the Court grants this request, the Government requests that time be excluded, with no objection from either defense counsel.

As such, we respectfully request an adjournment of the status conference to May 11, 2020, or thereafter.

Thank you. Should the Court have any questions or concerns, or should any further information be required, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.
Counsel to Shawndale Lewis

cc via e-mail: A.U.S.A. Samuel P. Rothschild
Matthew Kluger, Esq.